



## OPERATIONAL MEMO

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<b>TITLE:</b>	<b>REDUCTION TO THE REASONABLE OPPORTUNITY PERIOD (ROP) FROM 90 DAYS TO 30 DAYS FOR INCOME VERIFICATION</b>
<b>SUPERSEDES NUMBER:</b>	N/A
<b>EFFECTIVE DATE:</b>	<b>FEBRUARY 13, 2021</b>
<b>DIVISION AND OFFICE:</b>	<b>MEDICAID OPERATIONS OFFICE</b>
<b>PROGRAM AREA:</b>	<b>ELIGIBILITY POLICY</b>
<b>KEY WORDS:</b>	<b>INCOME, REASONABLE OPPORTUNITY PERIOD, REDUCTION, MAGI, NON-MAGI, VERIFICATION</b>
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<b>APPROVED BY: RALPH CHOATE</b>	

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### **Purpose and Audience:**

The purpose of this Operational Memo is to inform eligibility sites of changes being made to the Reasonable Opportunity Period (ROP) policy and Colorado Benefit Management System (CBMS). Changes made to the policy and to CBMS will reduce the ROP for income discrepancies from 90 calendar days to 30 calendar days for Modified Adjusted Gross Income (MAGI) and Non-MAGI programs.

### **Information:**

The Department's revision to the ROP is based on federal regulation described in 42 CFR 435.952(c)(2)(ii). This federal regulation requires that states provide a reasonable period to allow members to provide verification of income if the information cannot be verified electronically or is not reasonably compatible. However, federal regulations provide states discretion in choosing the time period for a reasonable opportunity for an income discrepancy. A ROP is a period of time granted to the member to provide a reasonable explanation of an income discrepancy when the information in the system is not reasonably compatible. Reasonable compatibility is a method of verification used for Medical Assistance programs that compares a member's self-attested income against income provided by an electronic data source. An explanation includes proof of income

documentation or a reasonable explanation supporting why there is an income discrepancy reported through an electronic wage source.

The Department has determined that reducing the ROP timeframe from 90 calendar days to 30 calendar days will benefit applicants and members who become eligible for benefits in submitting income information timely. It was determined through an analysis performed by the Department that the majority of members who returned their verification of income did so within 30 calendar days of the ROP given. Members expressed that anything with a due date longer than 30 days tended to get put aside and forgotten. Members with extenuating circumstances may request a good faith extension from their eligibility worker if more than 30 days is needed to provide income verification.

No action will be required by CBMS users, the ROP will be automatically calculated and due dates for income ROP requests will be automatically populated on the applicant's or member's pending verification check list.

**Attachment(s):**

None

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